

58394

FAA-99-5836-5

OFFICE OF THE  
CHIEF COUNSEL  
FAA DOCKET

DEPT. OF TRANSPORTATION  
DOCKET SECTION

Date: 6/22/99 9:15 AM

Sender: "Aerofab Inc." <aerofab@ime.net>

To: 9-NPRM-CMTS

Priority: Normal

Subject: Proposed Rule Changes for Repair Stations

1999 JUN 24 P 3: 09

99 JUN 30 AM 9: 29

---

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

14 CFR Parts 11, 91, 121, 135, and 145

(Docket No. FAA-1999-5836; Notice No. 99-09)  
RIN 2120-AC38

Part 145 Review: Repair Stations

AGENCY: Federal Aviation Administration, DOT.

ACTION: Notice of proposed rulemaking (NPRM).

As a PC holder with an MMF, Director of Maintenance of another Class 3 Repair Station, an IA, and an A&P with nearly two decades of General Aviation experience, it appears to me that the FAA is trying to eliminate Part 145 Repair Stations from General Aviation and small business in general. If this is not the intent, it will nonetheless be the result.

The burden of time, manpower, and capital investment to comply with the complex changes the FAA proposes will simply not be possible for many Repair Stations and small manufacturers. This will leave only unsupervised A&P's and IA's on one side, and large commercial operators on the other. By driving out small business Repair Stations, General Aviation safety will be severely compromised.

If safety really is the FAA's principal concern, then it should be developing ways to encourage small maintenance facilities to become Repair Stations. This would eliminate unsupervised maintenance and inspections on most aircraft, and provide increased consistency among maintenance operations. Once everyone is on board, then the system can be improved in graduated steps. Not in one big step.

Finally, the cost of complying with FAR Part 145 already adds significantly to the cost of operations. Increasing regulations leads to increased overhead, which leads to increased shop rates. As Repair Station shop rates

continue to rise, where will the hard pressed General Aviation aircraft owners bring their aircraft? To unsupervised A&P's and IA's. How will this improve safety? Increasing regulatory pressures will amplify an already unlevel playing field. This aircraft manufacturer just surrendered its Service Center's Repair Station Certificate due to its inability to compete with the low-overhead of non-repair station maintenance operations who are not held to the same standards. Aircraft owners are driven by economics, and they take their aircraft to good shops with lower shop rates. Simple as that.

What the FAA proposes is legitimate and commendable, but economically impossible for small businesses. Many maintenance operations will revert back to the less restrictive Part 43 requirements, and operations

considering Part 145 in the future will be deterred by the significant investment required. Regulations and safety may be increased, but only within a constricting circle, while the masses of General Aviation aircraft owners are driven into the realm of unsupervised inspection and maintenance.

Safety will be improved on one hand, while damaged on the other. General Aviation aircraft age, and the financial capabilities of the aircraft owners, further complicate a growing threat to safety. Please don't fan the flames by driving out small repair stations. There is more to aviation than big Airline, Charter, and Corporate operators. Don't forget the little guys.

Sincerely,

Philip J. Baker  
Chief Operating Officer  
Aerofab/Lake Aircraft



RFC822 TXT